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*Attorney for Petitioner Clay Burgon

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Clay Burgon,

13 Petitioner,

14 v.

15 D.W. Neven, *et al.*,

16 Respondents.

Case No. 2:14-cv-01128-RFB-CWH

**Unopposed motion for extension of
time to file a reply to answer.**

(First Request)

1 Petitioner Clay Burgon moves this Court for the entry of an order extending
2 the time within which he must file a reply to answer by 60 days from January 17,
3 2019 to and including March 18, 2019. The state, by Deputy Attorney General Ashley
4 Balducci, does not object to this request.

5 This is Burgon's first request for an extension of time. This motion is not filed
6 for the purposes of delay but in the interests of justice, as well as in the interests of
7 Burgon.

8 Counsel's schedule and circumstances beyond her control have precluded her
9 from meeting the current deadline of January 17, 2019. Counsel filed two oppositions
10 to motions to dismiss last week and will file an amended petition and another
11 opposition to motion to dismiss next week. Counsel is preparing for an evidentiary
12 hearing in the Eighth Judicial District Court, which requires travel to Idaho in
13 February. Counsel is also preparing for oral argument at the Ninth Circuit, which is
14 also in February and requires travel. Counsel is drafting an opening brief to the
15 Nevada Supreme Court. Counsel was assigned two new cases recently.

16 For these reasons, counsel respectfully asks this Court to grant Burgon's
17 request to extend the time for filing reply to answer by 60 days until March 18, 2019.
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1 Dated January 16, 2019.

2 Respectfully submitted,

3 RENE L. VALLADARES
4 Federal Public Defender

5 /s/ Kimberly Sandberg
6 Kimberly Sandberg
7 Assistant Federal Public Defender

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9 IT IS SO ORDERED:

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11 _____
12 RICHARD F. BOULWARE, II
13 UNITED STATES DISTRICT JUDGE

14 DATED this 17th day of January, 2019.
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Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: Ashley Balducci.

Clay Burgon
No. 87633
High Desert State Prison
PO Box 650
Indian Springs, NV 89070

/s/ Jessica Pillsbury
An Employee of the
Federal Public Defender